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RM-9208

**From:** "Frank M. Magarelli" <KB6POQ@ix.netcom.com>  
**To:** A7.A7(WKENNARD)  
**Date:** 5/18/98 2:59am  
**Subject:** LPFM, another comment.

I know you have heard alot of opinions about the proposed LPFM service. I would just like to add as a life long commercial and educational broadcaster, that it's been my understanding, and first hand experience that most of the people I know interested in operating an LPFM station qualify on a level of understanding rules, regulations, and technical proficiency beyond some of the large commercial stations. This opinion comes from much time spent on both sides of the fence, commercial/educational, and micro radio operations. As a broadcast engineer, I am suprised over and over with micro radio operators knowledge of a clean operation, and a willingness to demonstrate their respect for the set rules if given a license. Thank You for you're time, I think you are doing a wonderful job, and you're excitement for LPFM is very refreshing to hear.

Frank Magarelli  
KB6POQ 5210

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FEDERAL COMMUNICATIONS COMMISSION  
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MAY 18 1998

Rm-9208

From: James Marshall <jsm@jmarshall.com>  
To: A7.A7 (WKENNARD)  
Date: 5/17/98 9:46pm  
Subject: Please stop closing community radio stations

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Kennard,

I am writing to express that I am extremely disturbed by the efforts of NAB (National Association of Broadcasters) and the FCC to close down unlicensed community radio stations. I consider it to be highly immoral, and a direct First Amendment threat in more ways than one.

On a related topic, I urge you to rule in the spirit of FCC RM-9208, "In the Matter of Microstation Radio Broadcast Service".

I have been a licensed radio broadcaster since 1983, and have been actively broadcasting at licensed radio stations for nine of those fifteen years. I am a small business owner (Internet consulting), and I am in the process of becoming a homeowner.

From my experience in the industry, I know that the real reason large radio corporations are trying to exterminate community stations is to strengthen their oligarchy control over all radio broadcasting in this country. Already, the vast majority of broadcasting licenses are held by a small number of radio networks (which renders invalid the reasoning behind the 1943 and 1969 Supreme Court decisions regarding First Amendment issues vs. the right to broadcast). The cost of obtaining a license is prohibitive for any station without a lot of money behind it, which prevents any community stations from being licensed. Many would gladly get a license if the cost was more in line with actual FCC administration costs.

Remember, stations up to 100 watts were completely legal until 1979, when the FCC bowed to commercial industry pressure to silence them. This is a clear case of when "legal" does not necessarily mean "right". Community stations do not want to be illegal, but the FCC has now defined them to be so.

Note that few if any community radio stations have any advertising or otherwise make any money. They all exist for the sole purpose of helping the community. This is in contrast to virtually all stations that can afford a broadcasting license.

Radio is a powerful technology, with vast potential to help society because of its low cost on both the transmitting and receiving end. Community radio stations provide a valuable service, spreading local information and news that a powerful station 100 miles away wouldn't be bothered with. In particular, they provide a community-based news outlet, extremely valuable in this day of increasing corporate control and centralization of news media.

One responsibility of the FCC is to promote diversity on the airwaves. Outlawing community radio stations, while favoring large radio conglomerates, goes directly against this goal.

I was upset a couple of months ago when my own favorite radio station was shut down by the FCC for lack of a license. It was a low-powered station located a few blocks from my house, with a broadcast range of about a mile. It provided news, information, and opinions relevant to the neighborhood, and was a popular fixture of the community. It was a terrible loss when it was shut down, and many people miss it.

Contrary to their claim, NAB does NOT represent all radio broadcasters, and it is dishonest for them to claim so. In particular, they do not

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represent those who still have a sense of ethics beyond a pure profit motive, who still care anything about community, and who still care about democracy and equal treatment under the law.

Before you (the FCC) take any further action against community radio stations, I urge you to solicit views from a variety of parties, instead of simply trusting the NAB to speak for everybody. Remember, citizens cannot afford to lobby like commercial interests can, but it is citizens you are ultimately trying to serve best.

Thank you for your time.

Respectfully,

James Marshall  
james@jmarshall.com